

# PHYSICAL THERAPY BOARD OF CALIFORNIA Consumer Protection Services Program

1418 HOWE AVENUE, SUITE 16, SACRAMENTO, CA 95825-3204
TELEPHONE (916) 561-8200 FAX (916) 263-2560 TOLL FREE 1-800-832-2251
INTERNET http://www.ptb.ca.gov
EMAIL cps@dca.ca.gov

March 4, 2004

Citation No. 03-04-0104

Rekha Lund, P.T. 16756 Knollwood Dr Granada Hills CA 91344

License No. PT 24705

### **CITATION**

Investigation of a complaint submitted revealed actions taken by you which violate sections of the law regulating the practice of physical therapy.

A Citation is hereby issued to you in accordance with Section 125.9 of the Business and Professions Code for the violations described below.

On November 25, 2003, the Board received a complaint alleging that Andrew Choi, P.T. and Rekha Lund, P.T. at UCLA Medical Center in Los Angeles altered medical records. Based on the medical records reviewed, it has been confirmed that you are in violation of the law regulating the practice of physical therapy for documenting patient records with false information from the period of June 2003 through July 2003. These actions constitute unprofessional conduct.

## FIRST CAUSE FOR CITATION

1. Section 2261 of the Business and Professions Code

Knowingly making or signing any certificate or other document directly or indirectly related to the practice of medicine or podiatry which falsely represents the existence or nonexistence of a state of facts, constitutes unprofessional conduct.

2. Section 2660 of the Business and Professions Code

The board may, after the conduct of appropriate proceedings under the Administrative Procedure Act, suspend for not more than 12 months, or revoke, or impose probationary conditions upon any license, certificate, or approval issued under this chapter for unprofessional conduct that

includes, but is not limited to, one or any combination of the following causes: (i) Conviction of a violation of any of the provisions of this chapter or of the State Medical Practice Act, or violating, or attempting to violate, directly or indirectly, or assisting in or abetting the violating of, or conspiring to violate any provision or term of this chapter or of the State Medical Practice Act.

#### **ORDER**

Further, **you are ordered to pay a fine of \$ 1500.00** to the Physical Therapy Board of California within 30 days after receipt of this Citation.

If you wish to contest all or any part of this Citation, complete the enclosed "Notice of Appeal -Request for Informal Conference" form and return it to this office within 10 days after receipt of this Citation. The date indicated on the order of abatement will be held in abeyance <u>only</u> for any violation(s) you wish to contest. The time to correct all uncontested violations will be adhered to as specified. In the alternative, you may, within 30 days after receipt of this Citation, request a <u>formal</u> administrative hearing before an administrative law judge under the Administrative Procedure Act.

FAILURE TO RETURN THE REQUEST FOR INFORMAL CONFERENCE FORM OR TO REQUEST AN ADMINISTRATIVE HEARING WITHIN THE TIMES INDICATED WILL WAIVE YOUR RIGHT TO ADMINISTRATIVELY CONTEST OR APPEAL THIS CITATION.

Administrative Fine

\$ 1500.00

FOR YOUR PROTECTION AND TO ASSURE PROPER CREDIT,
PLEASE RETURN THE COPY OF THE CITATION
AND NOTE THE CITATION NUMBER ON YOUR CHECK
OR MONEY ORDER.

<u>March 4, 2004</u>	
Date	
	Original Signed By:
	STEVEN K. HARTZELL
	Executive Officer



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## ORDER OF ABATEMENT

March 4, 2004

Citation Against: Rekha Lund, P.T.	Citation No. 03-04-0104	
<u>First Cause</u>		
<u>Violations</u> : Business and Professions Code Section	n <u>2261</u> .	
Description:		
Knowingly making or signing any certificate or other document directly or indirectly related to the practice of medicine or podiatry which falsely represents the existence or nonexistence of a state of facts, constitutes unprofessional conduct.		
<u>Violations</u> : Business and Professions Code Section	n <u>2660</u> .	
Description:		

The board may, after the conduct of appropriate proceedings under the Administrative Procedure Act, suspend for not more than 12 months, or revoke, or impose probationary conditions upon any license, certificate, or approval issued under this chapter for unprofessional conduct that includes, but is not limited to, one or any combination of the following causes: (i) Conviction of a violation of any of the provisions of this chapter or of the State Medical Practice Act, or violating, or attempting to violate, directly or indirectly, or assisting in or abetting the violating of, or conspiring to violate any provision or term of this chapter or of the State Medical Practice Act.

## Order of Correction

You are hereby ordered to abate this violation immediately and to cease and desist from further violation.

Failure to comply with the provisions of this Citation and Order of Abatement within 30 days of receipt may result in further legal action.